

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**ACCURIDE ERIE L.P., a limited
partnership,**

Plaintiff/Counterclaim Defendant

v.

**INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA, LOCAL 1186, a
voluntary unincorporated association,**

Defendant/Counterclaim Plaintiff.

Case No. 05-CV-169 Erie

Judge Sean J. McLaughlin

[Electronically Filed]

MOTION FOR EXTENSION OF TIME TO ATTEMPT SETTLEMENT

Defendant/Counterclaim Plaintiff International Union, United Automobile, Aerospace & Agricultural Implement Workers of America and its Local 1186 ("UAW") file this motion requesting an extension of time to attempt settlement in this case. In support of its motion, the UAW states as follows:

1. On April 28, 2006, the parties in the above-captioned case appeared before the Court for a hearing on their pending cross-motions for summary judgment. At the close of the hearing, the Court requested that the parties make an effort to settle the case, and report back to the Court within two weeks.

2. The UAW's chief negotiator assigned to the bargaining unit at issue, Edward McGowan, is not available this week due to a previously scheduled arbitration, National Labor Relations Board hearing and collective bargaining negotiations. Mr. McGowan is unavailable next week due to a long-planned family vacation.

3. Prior to the Court's motion hearing last week, Mr. McGowan had already scheduled a meeting with the affected employees and retirees to discuss the possibility of settling the case. That meeting is scheduled for May 17, 2006. By that date, the Union has requested that the affected employees and retirees collect all of the documentation of their damages related to this lawsuit, which the Union will then share with the Company. Once the Union has gathered this information and met with the members, it will be in a position to meaningfully consider a settlement offer from the Company.

4. The undersigned has spoken with opposing counsel and he does not object to the request for an additional two weeks to permit the Union to gather the facts necessary to determine whether settlement is possible.

For the reasons set forth above, the UAW hereby requests that the Court grant the parties an additional two weeks, through and including May 26, 2006, to attempt to settle the case.

Respectfully submitted,

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Dated: May 3, 2006

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2006, I electronically filed a copy of the Defendant/Counterclaim Plaintiff UAW's Motion for Extension of Time to Attempt Settlement and proposed Order with the Clerk of the Court using the ECF system.

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